

SANTA MONICA MOUNTAINS CONSERVANCY

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SMMC
Agenda Item 8(b) Attachment
3/23/2009



March 24, 2008

David Somers
Department of City Planning
Environmental Review Section
200 North Spring Street, Room 750
Los Angeles, California 90012

Notice of Preparation
The Plaza at The Glen, 13007-13075 Victory Boulevard
ENV-2007-4063 EAF

Dear Mr. Somers:

The proposed Plaza at the Glen project site is located adjacent to the one-mile-long Tujunga Wash Greenway project within the Los Angeles County flood control rights-of-ways. This five million dollar public project was jointly implemented by the Mountains Recreation and Conservation Authority (MRCA) and the Los Angeles County Department of Public Works. The proposed project would result in significant adverse visual impacts on the greenway. The proposed project will also result in substantial adverse ecological impacts on the greenway within a couple of years when the adjacent native vegetation creates enough cover to harbor wildlife.

Given the substantial public investment in this project and its value as a community amenity, any development approved on the subject property must enhance not detract from the greenway's recreational, educational, and ecological value. The Draft Environmental Impact Report (DEIR) must include at least two economically feasible alternatives that meet the bulk of the project objectives and provide a minimum 50-foot-wide setback for all buildings along the greeway. At a minimum there should be 25 feet of 100 percent native landscaping along the full length of the greenway within the minimum 50-foot-wide setback. Small public sitting areas with impervious surfaces should be the only except to this 25-foot-wide native vegetation zone.

One of these DEIR alternatives must also include no structures greater than 28 feet in height within 100 feet of the public rights-of-ways. Such a height restriction is critical to retain the existing feeling of this unique public right of way. One of these two necessary DEIR alternatives must also include no diminution of the existing habitat area planted as part of

Notice of Preparation Comments
Environmental Assessment Form NO. ENV-2007-4063 EAF
The Plaza at The Glen, 13007-13075 Victory Boulevard
March 24, 2008
Page 2

the greeway project where the proposed transit hub is located. The proposed site is large enough to accommodate any such transportation facilities within impinging on existing habitat on public lands.

It is also critical that the DEIR address how the public will make use of the existing entrance to the greenway for the proposed project and each DEIR alternative. We encourage the applicant and the City to create a high quality interface between the greenway entrance and the proposed transit plaza/hub. As currently configured, there is no relationship between these two area elements.

The DEIR should also address how the public will be able to park on the subject private property to use the greenway. The scope and magnitude of the General Plan Amendment and Zone Change warrant the requirement of designate area for public parking. The City staff should contact our staff to work with the MRCA in making accommodations for a safe, usable joint use parking area. A DEIR alternative should address providing a permanent easement to the City or the MRCA for such a parking area.

A DEIR alternative should address the feasibility of a public restroom at the greenway entrance. The maintenance and security of the restroom should be amply funded by the proposed commercial facility. Again the scope of the project provides adequate nexus and economic engine to require such a mitigation measure. The MRCA should also be considered as an entity to manage this facility because that agency already maintains the greenway and patrols it with sworn rangers.

The DEIR must disclose that a request for a General Plan Amendment and Zone Change provides the City with great latitude to require a project that enhances public resources. The proposed project is a step backward in time in terms of its ratio of pervious to impervious surface. A project of this scale and density must include an onsite area to capture, retain and filter storm water runoff. Ideally this function could be achieved in the native vegetation setback zone along the Tujunga Wash Greenway.

Please send all future project documents and address any questions to Paul Edelman of our staff at the above letterhead address and by phone at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson